

DEPARTMENT OF HOMELAND SECURITY

P.L. 106-107, “Federal Financial Assistance Management Improvement Act of 1999

Fiscal Year 2005 Report

Participation in the Government-wide Streamlining and Grants.gov Efforts:

- ◆ *Participation in any of the P.L. 106-107 interagency work groups (and subgroups and teams under them). This may include discussions of leadership, staff participation, or other support.*

The Department of Homeland Security (DHS) continues to serve on various P.L. 106-107 Work Groups based on staff availability and subject matter expertise. The Director of the Office of Grant Policy and Oversight (GPO)/Office of the Chief Procurement Officer has the responsibility for policy and oversight of assistance program/initiatives which include coordinating functions with the government-wide initiatives. The Director serves on the Grants.gov Board of Directors, the CFO Grants Policy Committee, and is the DHS Point of Contact for government-wide vetting of P.L. 106-107 work group products. DHS staff participate on several P.L. 106-107 sub-work groups, e.g. Erroneous and Improper Payments (EIP) Grants, Grant Management Certification Working Group, Pre-Award “Terms and Conditions”, etc.

- ◆ *Participation in efforts to develop core data elements for special classes of activity/programs, e.g., research and related, mandatory grants, short forms.*

DHS’ participation in the development of the data core elements for special classes of activities and/or programs from both an administrative and programmatic perspective has been limited. We have not had the resources to provide long-term involvement, but we review and comment on the products developed. In addition, we are assessing data elements developed against the forms used by DHS assistance programs to determine if gaps exist between the information collected from the data elements and the information required by DHS programs. If the results from the review confirm that there are no statutory or regulatory gaps, DHS will formalize the adoption of the data core elements.

- ◆ *Assistance to OMB in implementing streamlining and simplification activities (e.g., assistance in reissuing OMB guidance as Subtitle A of 2 CFR).*

No DHS participation at this time.

- ◆ *Grants.gov support, including personnel support*

DHS provides financial support to Grants.gov based on the government-wide algorithm, but has not provided personnel support. DHS is working to develop and refine DHS-wide grant management policy and procedures in compliance with the government-wide requirements,

therefore, offering detailed staff and/or absorbing non-DHS mission-related work has been minimized. We encourage our grant management personnel to participate in government-wide committees and/or task-forces designed to support the P.L. 106-107 initiatives.

◆ *Participation in executive oversight of P.L. 106-107 and Grants.gov efforts*

The DHS Chief Procurement Office/Office of Grant Policy and Oversight (GPO), has primary responsibility for oversight of DHS grant initiatives and activities including the coordination and implementation of government-wide initiatives. The GPO Director serves on the Grants.gov Board of Directors, the Grants Policy Committee, and is the DHS “Point of Contact” for government-wide P.L. 106-107 initiatives and products. As DHS receives updates and/or new products from the P.L. 106-107 initiatives, the GPO disseminates documents to the DHS Grants Council, and, when appropriate, develops DHS grant management policy and procedures that provide formal guidance for the implementation of government-wide streamlining initiatives.

◆ *Participation in the Grants Management Line of Business Task Force*

The Director of the DHS Grant Policy and Oversight Office participated in the Grants Management Line of Business (GMLOB) Consortium Lead process, but was not involved in the Grants Management Line of Business Task Force. All DHS efforts and resources related to the GMLOB functions were provided to the internal DHS-wide grant management and financial operations and accountability processes/systems. It is anticipated that DHS will be more involved in the Grants Management Line of Business Task Force to assure that the DHS Grants Management Line of Business will be compatible with the government-wide efforts.

◆ *Participation in order streamlining and simplification activities being carried out under the auspices of the Federal Demonstration Partnership, the National Science and Technology Council’s Research Business Models Subcommittee, or the National Grants Partnership.*

DHS is involved in the Science and Technology streamlining efforts, DHS reviews and comments on the products as they are presented. This effort will provide the basis for developing the DHS policies for science and technology related programs in accordance with the government-wide initiatives.

Internal Efforts to Create an Environment Conducive to Grants Streamlining and Simplification and Assess Impact of Changes

General Approach

◆ *Management support, such as a memorandum from a senior manager indicating the agency’s support for the effort and expectations for staff.*

It is the responsibility of the CPO-GPO to identify opportunities and recommend solutions to streamline grant processes internally. The CPO established a DHS Grants Council whose members include representatives from all awarding offices and representatives from support

offices (Office of General Counsel, Office of the Chief Financial Officer and the Office of the Inspector General). The DHS Grants Council is chartered to advise the CPO on department-wide grant management activities and processes which include streamlining and simplification initiatives to achieve a unified approach.

When streamlining initiatives are finalized, it is the responsibility of the CPO-GPO to provide guidance to DHS awarding offices in understanding the initiatives and compliance with implementation deadlines. Through the Under Secretary for Management, there are several ways DHS transmits the requirements: DHS Management Directives (formal directives providing the mandatory compliance of government and DHS-wide grant management requirements); Grant Alerts (formal notices that explain requirements or procedures); electronic mail; DHS Grant Portal Web site; and DHS Grants Council presentations. For example, the Under Secretary for Management, executes "Management Directives" that require that non-disaster grants, cooperative agreements and other types of assistance opportunities be posted on the Grants.gov FIND Web site. In fiscal year 2004 and 2005, most of the discretionary and all competitive grant award announcements were posted to this Web site. External outreach was conducted through the DHS Web site, grant solicitations and guidance issued by awarding offices, and Grants.gov brochures sent to potential grantees.

The CPO-GPO is in the process of reviewing, evaluating and coordinating all grant management written processes and procedures. Management Directives are being processed to provide guidance on the requirements for streamlined standardized policy that is in accordance with government-wide initiatives.

- ◆ *Outreach to internal constituencies, such as technical/program and grants management staff, information technology staff, General Counsel, and others, and the methods used, e.g., newsletters, use of web sites.*

Internal outreach is provided through the DHS Grants Council and internal meetings. Membership includes representatives from the Chief Procurement Office, GPO, grant management awarding/administrative offices, the Office of General Counsel, and the Office of the Inspector General. This Council provides a monthly forum for the exchange of information. DHS also relies on the formal internal communication process, e.g. Management Directives and Grant Alerts, etc., to inform staff of government-wide streamlining requirements. DHS has internal and external Web sites that are used to post information regarding government-wide grant management activities.

- ◆ *Development and conduct of workshops or formal training.*

DHS headquarters provides resources and notifications of training to the DHS Grant Council membership and coordinates formal training with awarding offices for Grants.gov training. Future plans are to provide training on government-wide as well as DHS streamlining initiatives as they are formalized.

- ◆ *Outreach to external constituencies, such as status updates at their meetings.*

Grant Awarding Offices as well as Program Offices provide training and technical assistance to constituencies of DHS grant programs through formal training sessions as well as information posted on Web sites.

- ◆ *Formation of agency-wide or component groups to recommend implementing actions and track progress of streamlining initiatives.*

DHS has not implemented an initiative to track the progress of the P.L. 016-107 streamlining effort because DHS is still developing policy and procedures that will incorporate the government-wide initiatives.

- ◆ *Internal efforts, such as review of internal policies, to assess the potential for additional streamlining consistent with government-wide initiatives.*

DHS is in the process of developing policies and procedures for the grant management functions. They will be in compliance with the streamlining efforts of P.L. 106-107 and government-wide initiatives.

- ◆ *Any planned or actual activities to assess the impact of streamlining (e.g., assessment of customer satisfaction or whether competition or quality of applications is enhanced).*

There are no plans to assess the impact of streamlining, DHS is consolidating the processes of legacy agencies transferred under its creation.

Implementing the Recent Changes Affecting the Pre-Award Process

A. Grants.gov FIND:

This paragraph may include a discussion of:

- ◆ *Statistics indicating use of Grants.gov FIND (e.g., percentage of discretionary funding opportunity announcements or number of synopses posted in relation to number eligible), and indication of period covered.*

FY 2005 was used to notify DHS program and awarding offices of the requirement to post funding opportunities on Grants.gov. As a result of this effort, it is estimated that 60% of the discretionary and competitive funding opportunity announcements were posted on Grants.gov FIND.

- ◆ *Use of Grants.gov FIND beyond the minimum requirements of the OFFM Policy Letter (which requires posting for discretionary funding opportunities for which there will be competition).*

The majority of DHS funds and programs are not competitive. Funding is distributed through State formula allocations. All competitive discretionary programs were posted on Grants.gov FIND.

- ◆ *Any feedback from potential applicants about the utility of the site.*

DHS did not solicit or receive feedback from potential applicants on the utilization of the Grants.gov FIND site.

B. Announcement Template

- ◆ *Training and communication about requirement.*

DHS issued Management Directive, (MD 0772) requiring the use of Grants.gov FIND to post grant opportunities. The Grants.gov FIND Management Directive standardized the announcement process and requires the use of the format/template issued by OMB. It is the responsibility of the GPO to provide oversight on all grant funding opportunity postings in compliance with statute, regulations, executive orders and other government-wide mandates. In order to assure that DHS awarding offices are complying with Grants.gov FIND posting requirements, and to ensure consistency within the Department, the CPO-GPO is responsible for the posting and maintenance of the DHS-Grants.gov FIND portal.

- ◆ *Statistics indicating use of the template (e.g., percentage of all eligible funding opportunity announcements or number of funding opportunity announcements in standard format in relation to number eligible).*

Through the DHS Management Directive (MD 0772), DHS adopted the Grants.gov template for posting grant funding opportunities on Grants.gov. Approximately 75-80% of assistance programs were posted on Grants.gov using the government-wide template. It is anticipated that 100% of the grant opportunities will be posted on Grants.gov using the template with the exception of security sensitive programs.

- ◆ *Any activities to oversee compliance with use of the template.*

The GPO either directly posts or monitors the use of the Grants.gov announcement template.

- ◆ *Efforts to streamline the internal process for developing and issuing announcements (e.g., further standardization across an agency's components/programs).*

Under DHS Management Directive 0772, Assistance Programs Funding Opportunities: Public Notification Process for Grants.gov/FIND, DHS adopted the government-wide streamlining process and template.

- ◆ *Types of programs/activities in which being used if more than discretionary grants and cooperative agreements.*

In addition to the discretionary and competitive programs, DHS has posted allocated formula and direct assistance programs on the Grants.gov website.

- ◆ *Process improvements, simplifications, or savings related to agency implementation (e.g., use of alternatives to publishing full announcement in Federal Register).*

DHS is a new agency that is establishing policies and procedures. The DHS grant opportunity announcement process was executed under the P.L.106-107 streamlining initiatives. DHS only publishes funding announcements in the Federal Register when required by statute or regulations.

- ◆ *Any feedback from agency constituencies on use of the template.*

Agency constituents have expressed that the template does not meet their program needs.

C. Grants.gov APPLY

- ◆ *Work undertaken to adapt agency systems to allow electronic receipt of applications and interface with the Grants.gov APPLY (e.g., training, system-to-system testing, data analysis, and forms development).*

DHS/FEMA completed the interface with Grants.gov APPLY and the Assistance to Firefighter Grant Program system this year. It will be tested on a small program in FY 2006.

◆ *Number of programs in/planned to be in Grants.gov APPLY and time frame.*

The number of posted applications on Grants.gov this fiscal year was minimal. It is anticipated that in FY 2006 DHS will reinforce the requirement to post discretionary and competitive funding opportunities on Grants.gov APPLY. There is a concern that the Grants.gov system is not as robust as the DHS/FEMA mitigation system as the mitigation system accepts applications from sub-applicants forwards them to the applicant, who reviews and approves them to forward in a consolidated application to FEMA. This system captures both grantee and sub-grantee project information.

◆ *Number of application packages posted and applications received through Grants.gov APPLY and time frame.*

The number of applications posted on Grants.gov in fiscal year was minimal because DHS still relies on other agencies to provide grant management support. We will require the use of Grants.gov if the outsourced support is renewed in FY 2006.

◆ *Outreach on the DUNS and Central Contract Registration requirements (for Grants.gov APPLY).*

There have been several outreach efforts made to notify applicants of the requirements to obtain DUNS and CCR registrations: All DHS recipient of grant awards were notified that they must register with DUNS and CCR in order to apply for new applications; DHS requires that the requirements be included in the funding opportunity announcement/guidance; DHS worked with Grants.gov to customize a brochure to send to DHS applicants and post on the DHS website.

◆ *Barriers, if any, to implementation and actions to minimize or remove them*

DHS has a concern that the Grants.gov Web site will not be compliant with the statutory requirement for receipt of “Protected Critical Infrastructure Information Program” application information. The DHS Office of General Counsel is reviewing the statute to provide guidance with this issue.

D. Other

DHS has established a “One-Stop-Shop” for grant opportunities for first responder programs. This has streamlined the distribution of application information and simplified the application process for First Responders.